

Exhibit C

<input type="checkbox"/>	EXPEDITE
<input type="checkbox"/>	No hearing set
<input checked="" type="checkbox"/>	Hearing is set
	Date: 11/20/2008 _____
	Time: 9:00 a.m. _____
	Judge/Calendar: _____

THE HONORABLE CHRIS WICKHAM

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THURSTON COUNTY

DAROLD R. J. STENSON,

Plaintiff,

v.

ELDON VAIL, Secretary of Washington
Department of Corrections (in his official
capacity); *et al.*,

Defendants.

No. 08-2-02080-8

DECLARATION OF DIANE M. MEYERS

I, DIANE M. MEYERS, hereby declare as follows:

1. I am an attorney in the law firm of Perkins Coie LLP, counsel for Darold R. J. Stenson, plaintiff in this action. I am over the age of 18 years and make this declaration on my personal knowledge.

2. On November 18, 2008, I spoke with our client Darold R.J. Stenson about the allegations contained in the declarations submitted in support of Defendants' Motion for Summary Judgment.

DECLARATION OF DIANE M. MEYERS – 1

Perkins Coie LLP
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Phone: 206.359.8000
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1 3. At paragraph 3 of the declaration of Stephen D. Sinclair, Mr. Sinclair states
2 that he "reviewed Mr. Stenson's medical records" and knows "that [Mr. Stenson's] veins
3 have been examined and are considered 'normal' in that there are no signs of collapsed
4 veins."
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8 4. Mr. Stenson has Type-2 diabetes and twice a year undergoes a medical
9 review that includes a blood draw. Because Mr. Stenson's veins are too deep, they must be
10 accessed through the hand.
11

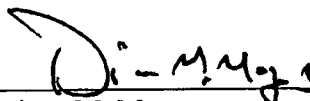
12
13
14 5. Mr. Stenson reports that his veins have not been examined for purposes of
15 establishing an intravenous line through which lethal drugs can be administered.
16

17
18 6. On October 27, 2008, we submitted Mr. Stenson's medical release and a
19 request for a copy of Mr. Stenson's complete medical file. The Department of Corrections
20 has not yet provided this file.
21

22
23 7. On November 18, 2008, we inquired about the status of our medical records
24 request. We were told that the DOC employee responsible for copying the records would
25 not be in the office during the week of November 17. We were not told when the copies
26 would be provided to us.
27

28
29 I declare under penalty of perjury of the laws of the United
30 States and the State of Washington that the foregoing is true
31 and correct.
32

33
34 DATED this 17th day of November, 2008
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38 Diane M. Meyers
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DECLARATION OF DIANE M. MEYERS - 2

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